

Ex. 6 - Personal Privacy

squirepattonboggs.com

W. Caffey Norman

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BY HAND

Jeffery T. Morris
Director
Office of Pollution Prevention and Toxics
Environmental Protection Agency
William Jefferson Clinton Building
1200 Pennsylvania Avenue, NW
Mail Code 7401M
Washington, DC 20460

Re: Docket Nos. EPA-HQ-OPPT-2016-0737; EPA-HQ-OPPT-2016-0742

Dear Jeffery:

As mentioned in my message, I write on behalf of the Halogenated Solvents Industry Alliance, Inc. (HSIA), which represents producers and users of trichloroethylene (TCE) and methylene chloride (dichloromethane or DCM). HSIA submitted to Docket No. EPA-HQ-OPPT-2016-0387 the enclosed comments on EPA's proposed rule banning use of TCE in vapor degreasing (82 Fed. Reg. 7432 (Jan. 19, 2017)) and submitted to Docket No. EPA-HQ-OPPT-2016-0231 the enclosed comments on EPA's proposed rule banning use of DCM in paint stripping (82 Fed. Reg. 7464 (Jan. 19, 2017)).

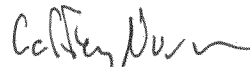
Earlier, HSIA submitted to Docket No. EPA-HQ-OPPT-2016-0163 the enclosed comments on EPA's proposed rule banning manufacture of TCE for and use of TCE in aerosol degreasing and in spot cleaning by dry cleaning facilities. 81 Fed. Reg. 91592 (Dec. 16, 2016). As you know, all these rules were proposed under the authority of § 6(a) of the Toxic Substances Control Act (TSCA), which was amended in June 2016 by the Frank R. Lautenberg Chemical Safety for the 21st Century Act ("Lautenberg Act").

The enclosed comments note that, while EPA is authorized under TSCA § 26(l)(4) to propose a § 6 rule based on a risk assessment completed before TSCA was revised, there is no requirement or deadline for it to do so. Thus, EPA's progress in meeting the ambitious goals of the Lautenberg Act would not be impeded by deliberate review of the subject proposal. The situation is very different for the ten priority compounds recently designated by EPA under

TSCA § 6(b)(2)(A).¹ For these ten designated pollutants, TSCA establishes deadlines for risk assessments to begin later this year and a schedule for rulemakings. TCE and DCM are among these priority compounds.

The HSIA comments urge EPA not to adopt the proposed bans and instead to review those uses considered as part of the upcoming assessments for TCE and DCM. As the respective dockets for the risk evaluation scoping efforts under TSCA for the ten designated chemicals are not open at this time, I wanted to send these comments directly to you so that they can be taken into account as you deem appropriate, the TCE comments as part of EPA-HQ-OPPT-2016-0737, and the DCM comments as part of EPA-HQ-OPPT-2016-0742.

Very truly yours,



W. Caffey Norman

Enclosures

¹ Designation of Ten Chemical Substances for Initial Risk Evaluations, 81 Fed. Reg. 91927 (Dec. 19, 2016); Risk Evaluation Scoping Efforts under TSCA for Ten Chemical Substances, 82 Fed. Reg. 6545 (Jan. 19, 2017).